

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Newport News Division

UNITED STATES OF AMERICA

v.

Criminal No.: 4:23-cr-054

TERRANCE LEONARD VICK,

Defendant.

**DEFENDANT'S MOTION AND BRIEF IN SUPPORT TO MODIFY
ORDER SETTING CONDITIONS OF RELEASE**

NOW COMES the Defendant, Terrance Leonard Vick (the “Defendant”), by counsel, and respectfully moves this Court for entry of an order modifying His conditions of release. In support of His motion, the defendant states the following:

1. On October 12, 2023, this Court set Initial Conditions of Release as to Mr. Vick (Doc. 287).
2. Mr. Vick’s bail required that he remain in Newport News, VA with a local family member third-party custodian (“TPC”) (Condition (7)), remain in the Eastern District of Virginia (Condition (8)(f)), and participate in Home Detention at the Newport News address with location monitoring (Conditions (8)(p)(ii) and (q)(i)).
3. Mr. Vick desires to move back to his home state of Georgia so that he may be with his High School-aged child and mother of his child.
4. Mr. Vick’s current Third-Party Custodian (“TPC”) in Newport News, VA is listed under condition (7). Mr. Vick requests that the Court permit his long-time friend Ashley Macintosh to serve as a new TPC in Georgia.

5. Ashley Macintosh is a family friend of Mr. Vick's for many years. Mr. Vick was between residences in Georgia at the time of his arrest. Ms. Macintosh is willing and well-suited to serve as a TPC.
6. Since his arrest, Ms. Vick has been in full compliance with his bail and location restrictions.
7. Counsel has corresponded with Ms. M. Childress, U.S. Probation Officer for the Eastern District of Virginia, who does not oppose this change of location or TPC.
8. Counsel has conferred with Assistant United States Attorney Eric Hurt, who does not object.
9. Counsel requests that his Bail Conditions be amended or stricken to permit Mr. Vick travel and residence in Georgia at 5543 Pinegate Drive, College Park, Georgia, with Ms. Macintosh as TPC, and travel to the Eastern District of Virginia for Court, Probation, and meetings with Counsel.

Law and Argument

Pursuant to 18 U.S.C. § 3145(a)(2) a defendant may file a motion for amendment of the conditions of release, which shall be determined promptly. This Court has original jurisdiction over the offense and is proper to hear this motion.

For the reasons stated above, the Defendant makes this request.

Requested Relief

WHEREFORE, the Defendant, by counsel, moves this Court for entry of an Order modifying the conditions of release.

I ask for this:

/s/
Brian M. Latuga, Esquire
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Counsel for Defendant Terrance Vick

CERTIFICATE OF SERVICE

I hereby certify on the 24th day of January, 2024, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send a notification of such filing (NEF) to all counsel of record.

With courtesy copy e-mailed to:

Margaret Childress, US Probation Officer
By E-mail

/s/

Brian M. Latuga, Esquire
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